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1	A. Alderman.	1	A. I couldn't say.
2	Q. Okay. And were you an alderman at Harvey?	2	I'm too busy campaigning to be honest with
3	A. Yes.	3	you.
4	Q. In what years?	4	Q. Okay. To know how many people are working on
5	A. It was 20-- -- I believe, '01 through 2008, I	5	the campaign?
6	believe.	6	A. Right.
7	Q. I'm sorry, you said 2001 to 2008?	7	Q. Do your campaign workers collect signatures?
8	A. I said 2001 through 2008 because it was two	8	A. Some do.
9	full year terms, I believe.	9	Q. Okay. Do they go door to door trying to get
10	Q. That you were an alderman? Weren't you mayor,	10	people to vote?
11	too?	11	A. It's a variety of methods in terms of, you
12	A. No, I'm sorry, I'm sorry, it was '99 or '96.	12	know, door to door, various businesses. You know,
13	I want to say '96 to 2000 or --	13	looking for Harvey residents.
14	Q. You were mayor in 2003, right?	14	Q. You don't make phone calls to residents?
15	A. No, let me see.	15	A. From the political office they certainly make
16	'99 I ran -- so, no, it had to be '90 to 91	16	phone calls.
17	to -- yeah, '91 to '95 and '95 to '99, yeah, those are	17	Q. Conduct fundraisers?
18	the correct dates.	18	MR. SMITH: Is that a question?
19	Q. Okay. Alderman from '91 to '99?	19	MR. WALSH: Yes.
20	A. Right.	20	BY MR. WALSH:
21	Q. And what did you do between '99 and 2003	21	Q. Is one of the activities that the campaign
22	politically, did you hold an office?	22	workers do is conduct fundraisers?
23	A. Not -- no.	23	A. There's a committee that sets up the
24	Q. Were you assistant superintendant during those	24	fundraisers.
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1	years?	1	Q. And who's on that committee?
2	A. Yes.	2	A. I don't recall exactly who's on the fundraiser
3	From '91 to '99 I was the alderman.	3	because it's an ever changing committee.
4	Q. Uh-huh.	4	Q. Does that committee have a nickname?
5	A. Okay. '99 I ran for mayor and I was	5	A. I'm not sure.
6	unsuccessful.	6	Q. Okay. Was Drenia Lewis on that committee?
7	Q. Uh-huh.	7	A. She had some affiliation with it. I don't
8	A. And then in four -- four years, during that	8	know if she was exactly on the committee.
9	time, I was basically just working in the community.	9	Q. Was Bettie Lewis on that committee?
10	Working with the children and getting prepared the 2003	10	A. She had some affiliation, I'm not sure if she
11	election.	11	was exactly on the committee.
12	Q. Was the '99 election close?	12	Q. Do you know Sandra Alvarado?
13	A. Extremely close.	13	A. Yes, I do.
14	Q. Okay.	14	Q. Okay. Was she on the committee?
15	A. I think like 300 votes or something like that.	15	A. She served on the committee, I believe.
16	Q. Out of how many total do you recall	16	Q. And Sandra Alvarado was the assistant to the
17	approximately?	17	chief of police?
18	A. I don't recall the exact number.	18	A. Yes, sir.
19	Q. Was it an expensive campaign?	19	Q. And the PR director for Harvey?
20	A. I don't recall how much it was.	20	A. Yes, sir.
21	Q. Do you know how many people typically work on	21	Q. For about 14 years?
22	your mayoral campaign?	22	A. Seems like that term could be correct.
23	A. I don't recall the exact number.	23	Q. Okay. And did Ms. Alvarado -- other than her
24	Q. Is it more than 50?	24	participation on that committee, did she do political

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1 work for you? 2 A. She did some political work, uh-huh. 3 Q. You ever see her at your campaign office? 4 A. Yes. 5 Q. Other than the people that you've already 6 discussed, how many employees at the City of Harvey do 7 you know that have performed political work for you? 8 A. I really couldn't give you an accurate number 9 because, you know, I really don't actively, you know -- 10 you know, a lot of individuals say they working for you, 11 but you can't really, you know, give like -- that's not 12 an accurate gauge. 13 Q. How about Commander Neil, do you know 14 Commander Neil in the police department? 15 A. Yes, sir. 16 Q. Has he done political work for you? 17 A. Yes, sir. 18 Q. Okay. How about former Commander Patterson in 19 the police department, has he done political work for 20 you? 21 A. Yes. 22 Q. Okay. How about Sammy Young, do you know 23 Sammy Young? 24 A. Yes.	Page 62	Page 64
1 Q. Has he done political work for you? 2 A. Yes. 3 Q. Okay. And what's his position in the police 4 department? 5 A. Sammy is the director of -- 6 Q. Part-timers? 7 A. -- community resource officer. 8 Q. Okay. How about Deputy Chief Banks, has he 9 done political work for you? 10 A. I can't recall -- I can't recall. I'm not 11 sure. 12 Q. Showing you what I'm going to mark as Kellogg 13 Exhibit 6.	Page 63	Page 65
(Kellogg Deposition Exhibit No. 6 marked as requested.) BY MR. WALSH: 17 Q. Do you recognize Exhibit 6? 18 A. Yes. 19 Q. And would you turn to the last page. Is that 20 your signature? 21 A. Yes. 22 Q. And did you review this document before you 23 signed it? 24 A. Yes.		
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1	can't recall.	1	dates, the years, the times, the places where I met
2	Q. Okay. Did you ever meet Nick Graves' campaign	2	Mayor Genova.
3	manager, Rosemaria Genova? Genova I should say.	3	Q. Does Calumet City border Harvey?
4	A. I thought Chris Barton was his campaign	4	A. It's not particularly next door, no.
5	manager.	5	Q. Okay. Do you know how far it is from Harvey?
6	Q. In '99 or 2003?	6	A. It's -- you probably have to go through four
7	A. I thought he ran basically all his -- I mean,	7	different communities to get there.
8	to the best of my recollection, I thought Chris Barton	8	Q. It's that far?
9	was --	9	A. Yeah.
10	Q. Okay. Did you ever meet Rosemaria Genova?	10	Q. Okay. Did you ever go to a -- Strike that.
11	A. Best -- my best recollection, I can't recall.	11	Did you ever see Mr. Genova at any social
12	Q. Okay. Were you the only speaker -- or strike	12	functions while he was mayor?
13	that.	13	A. I can't recall if I ever saw Mayor Genova at
14	Did you see a woman speak at Nick Graves'	14	any social events.
15	funeral, give the eulogy?	15	Q. When you appointed Joseph Letke as
16	A. I -- I can't recall. I know -- I know I	16	comptroller, were there other applicants for the
17	spoke.	17	position?
18	Q. Okay. Did anyone else speak?	18	A. I'm -- I'm -- I can't recall at the time if
19	A. I can't recall exactly who all spoke because I	19	there was, but prior to Mr. Letke, I think Stanley King
20	was pretty -- it was pretty heartbreaking.	20	was our accountant so I'm not -- I can't recall if there
21	Q. Do you know whether Rosemaria Genova worked on	21	was other applicants.
22	Nick Graves' campaign in '99 or 2003?	22	Q. Did Mr. Letke's political contributions play a
23	A. I can't -- I can't recall if she did or she	23	role in your decision for you to appoint him?
24	did not. I'm not sure. I can't recall.	24	A. I select individuals based on their
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1	Q. When you were an alderman, did Harvey have a	1	qualifications.
2	newsletter?	2	Q. So is that a no?
3	A. When I was an alderman?	3	A. Again, I selected Mr. Letke based on his
4	Q. Yes.	4	qualifications.
5	A. I can't recall if we had a newsletter back	5	Q. And I have to get a clear record so, you know,
6	then. I'm not sure.	6	I need you --
7	Q. Do you know if Rosemaria Genova wrote the	7	A. I mean, just because someone donates to my
8	newsletter in Harvey?	8	campaign don't -- you know, no, it was based on his
9	A. I can't recall if she did or didn't.	9	qualifications.
10	Q. Did you ever meet -- meet anyone named	10	Q. Okay. Not on the donation?
11	Rosemaria Genova at a Harvey council meeting?	11	A. No, sir.
12	A. I can't recall. I -- I can't recall meeting	12	Q. Okay. At the time he was appointed, his
13	her at a Harvey city council meeting. I -- I can't	13	company was called Letke & Associates, correct?
14	recall.	14	A. I believe so.
15	Q. Do you know Rosemaria's husband, Jerry Genova?	15	Q. And do you know whether it later became Alli
16	A. I knew him as the Mayor of Calumet City.	16	Financial?
17	Q. Okay. And did you meet during the time that	17	A. I believe at some time it became Alli
18	he was mayor?	18	Financial.
19	A. I can't exactly recall exactly when and where	19	Q. Okay. Did Mr. Letke ever give you anything of
20	we met, but I knew that he was the Mayor of Calumet	20	value in exchange for being appointed comptroller?
21	City.	21	MR. SMITH: Object to the form of the question.
22	Q. And that was during the same time that you	22	When you say thing of value --
23	were alderman in Harvey, correct?	23	MR. WALSH: Uh-huh.
24	A. I don't know the years. I can't associate the	24	MR. SMITH: -- are you referring to a political

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<p>1 contribution or something else?</p> <p>2 MR. WALSH: I'm talking about financial -- anything</p> <p>3 that's financial, not just -- not limited to a political</p> <p>4 contribution and I'm not talking labor.</p> <p>5 MR. SMITH: So -- so the question is --</p> <p>6 MR. WALSH: Did he give you any money?</p> <p>7 MR. SMITH: -- any kickbacks?</p> <p>8 MR. WALSH: No, no, no, I didn't say kickbacks.</p> <p>9 BY MR. WALSH:</p> <p>10 Q. Did he give you any money, be it any kind of</p> <p>11 money, be it political contribution or otherwise in</p> <p>12 exchange for being appointed comptroller?</p> <p>13 A. The best of my recollection Mr. Letke is just</p> <p>14 like anyone who donates to my campaign. They donate to</p> <p>15 my campaign, they don't donate to me.</p> <p>16 Q. Okay. Has Mr. Letke ever given you money</p> <p>17 outside of a campaign donation?</p> <p>18 A. Why would he give me money outside a campaign</p> <p>19 donation?</p> <p>20 Q. I can't speak for Mr. Letke, I'm just asking</p> <p>21 you if you ever --</p> <p>22 A. No, I don't accept money outside of campaign</p> <p>23 donations --</p> <p>24 Q. Okay.</p>	<p>Page 70</p> <p>1 Q. Okay. And then is there an individual that</p> <p>2 assembles those individual budgets into the city budget?</p> <p>3 A. It's my understanding that each department</p> <p>4 head assembles a budget and they submit the budget to</p> <p>5 our comptroller.</p> <p>6 Q. Okay. So was Mr. Letke in charge of, I guess,</p> <p>7 sort of synthesizing budgets while he was the</p> <p>8 comptroller?</p> <p>9 MR. SMITH: I'm going to object to any further</p> <p>10 questions regarding Mr. Letke's role as comptroller and</p> <p>11 I'm going to instruct the witness based on the Fifth --</p> <p>12 the provision of the Fifth Amendment not to</p> <p>13 self-incriminate due to the pending SCC litigation and</p> <p>14 also because these questions can be asked when Mr. Letke</p> <p>15 is deposed.</p> <p>16 Mayor Kellogg is not a CPA, he's not a lawyer,</p> <p>17 and the office of the comptroller, those duties are</p> <p>18 designated by the Illinois Municipal Code.</p> <p>19 MR. WALSH: Okay.</p> <p>20 MR. SMITH: We're not going -- we're not going to</p> <p>21 answer no questions about --</p> <p>22 MR. WALSH: He can plead the Fifth all he wants,</p> <p>23 you don't have to do a big speaking objection.</p> <p>24 My -- my point is that as the mayor he</p>
<p>1 A. -- from anyone.</p> <p>2 Q. Okay. What were Mr. Letke's responsibilities</p> <p>3 between 2008 and 2010?</p> <p>4 A. It's clear he was the comptroller who served</p> <p>5 as the financial advisor and provided guidance on</p> <p>6 financial matters and erected -- well, he provided</p> <p>7 direction and guidance to the mayor as well as the city</p> <p>8 council and financial matters.</p> <p>9 Q. Did other department heads need to get</p> <p>10 approval from Mr. Letke for expenditures?</p> <p>11 A. In terms of the -- the overall -- the overall</p> <p>12 operations and the nuances of that particular office --</p> <p>13 Q. Yes.</p> <p>14 A. -- that's between the department head and</p> <p>15 Mr. Letke.</p> <p>16 Q. You don't know?</p> <p>17 A. I'm sure that they -- there was some -- you</p> <p>18 know, they had to work, you know, collectively together.</p> <p>19 Q. Harvey is supposed to put a budget together</p> <p>20 each year, correct?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And do the department heads each create</p> <p>23 a budget for their own department?</p> <p>24 A. To the best of my knowledge, they do.</p>	<p>Page 71</p> <p>1 probably has some knowledge of what department head's</p> <p>2 functions are and not really get into very much detail.</p> <p>3 If he want's to plead the Fifth to Letke,</p> <p>4 that's fine. I have to ask the questions to get a clear</p> <p>5 record. I don't have a problem with it.</p> <p>6 MR. SMITH: That's fine.</p> <p>7 BY MR. WALSH:</p> <p>8 Q. Did Mr. Letke have an office in Harvey while</p> <p>9 he was comptroller?</p> <p>10 MR. SMITH: You can answer that question.</p> <p>11 BY THE WITNESS:</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And was the office in close proximity</p> <p>14 to yours?</p> <p>15 A. No.</p> <p>16 Q. Was it in City Hall? I mean Letke's office.</p> <p>17 A. Yes.</p> <p>18 Q. Did other employees of Letke & Associates</p> <p>19 perform work for Harvey while he was the comptroller?</p> <p>20 A. He had a team.</p> <p>21 Q. And do you know who was on his team?</p> <p>22 A. I believe it was Maggie Britton, I believe.</p> <p>23 Q. Uh-huh.</p> <p>24 A. And Gloria -- I can't recall Gloria's last</p>

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1	name.	1	A. I wouldn't know that. I wouldn't know in
2	Q. Okay. And did Maggie and Gloria work in	2	terms of how many employees Mr. Letke had working out of
3	Harvey City Hall?	3	the Harvey office.
4	A. Yes, they did.	4	Q. Doing work on Harvey matters.
5	Q. When Joseph Letke was the comptroller, how	5	A. I wouldn't know that. I couldn't.
6	often did you interact with him?	6	Q. Did Mr. Letke -- did Mr. Letke used to tell
7	A. Understand that I was part-time and my	7	you when he would hire someone at Letke & Associates?
8	full-time duties were really at the school so my	8	A. Well, Letke & Associates is a separate entity
9	interactions with, you know, the employees of the city	9	from the City of Harvey.
10	was extremely limited due to the fact that I was working	10	Q. Understood.
11	at the school.	11	A. So, I mean, that's his business.
12	Q. Okay. How often did you speak with Mr. Letke	12	Q. Understood.
13	each week while he was comptroller?	13	What I'm asking you is did he -- did he have a
14	A. Very limited.	14	policy or practice of telling you when he hired someone
15	Q. Would you speak to him at least once a week?	15	new at Letke & Associates?
16	A. I wouldn't -- I can't recall speaking to him	16	A. I mean, that's his business, why would he have
17	once a week. It was very limited.	17	to confirm -- you know, he wouldn't have to confirm with
18	Q. Did Maggie Britton and Gloria work at Harvey	18	me, that -- that's his business --
19	full-time?	19	Q. And I understand --
20	A. I'm not sure if they were there full-time or	20	A. -- which is a separate entity from the City of
21	part-time.	21	Harvey.
22	Q. Have you ever met Maggie Britton?	22	Q. I understand that.
23	A. Yes.	23	What I'm asking you though is did he have a
24	Q. Was her office -- did she have a separate	24	habit of telling you when he hired someone at Letke &
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1	office in the City of Harvey?	1	Associates?
2	A. They worked out of the comptroller's office.	2	A. Well, a habit is a pattern.
3	Q. Did Ms. Britton brief you on Letke &	3	Q. Right.
4	Associates' activities in the City of Harvey?	4	A. And so there was no repetitive practice of
5	A. Brief me?	5	Mr. Letke informing me of individuals that he hired
6	Q. Uh-huh, did Ms. Britton ever discuss with you	6	because that's his firm, I can't, you know --
7	what Letke & Associates was doing in Harvey?	7	Q. Do you ever recall him telling you that he had
8	A. Again --	8	hired someone at Letke & Associates?
9	MR. SMITH: Object to the form of the question.	9	A. That's my recollection, I can't recall having,
10	What Letke & Associates was doing?	10	you know, conversations about his employees.
11	MR. WALSH: Uh-huh.	11	Q. Do you ever recall him telling you that he had
12	MR. SMITH: What exactly do you mean?	12	hired Mr. Genova?
13	BY MR. WALSH:	13	A. Best of my recollection, I can't recall having
14	Q. What sort of job functions they were	14	a conversation relative to Mayor Genova.
15	performing.	15	Q. Showing you what I will mark as Exhibit 7.
16	A. Well, as I indicated earlier, me working	16	(Kellogg Deposition Exhibit No. 7
17	full-time at the school, my conversation with	17	marked as requested.)
18	Ms. Britton and Mr. Letke were very limited. Most of	18	BY MR. WALSH:
19	the conversation was handled -- if there was	19	Q. Showing you what's been marked as Exhibit 7.
20	conversation, it would be from my administrative	20	Exhibit 7 are -- is Joseph Letke's answers to
21	assistant, but my conversation with them was very	21	interrogatories in this case.
22	limited.	22	A. Uh-huh.
23	Q. Do you know how many employees of Letke &	23	Q. And I want to call your attention to Page 6,
24	Associates performed work for Harvey?	24	No. 15, and it asks to identify whether Joseph Letke

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1	ever discussed plaintiff with Eric Kellogg and your	1	comptroller's office.
2	answer was in the affirmative, identify the time, date,	2	Q. Okay. You ever meet a gentleman named
3	location and subject matter of the conversation.	3	Christopher Galloway?
4	A. Uh-huh.	4	A. Christopher Galloway?
5	Q. His answer is as -- as it's answered in	5	Q. An attorney that worked for Letke &
6	Interrogatory No. 15, defendant states that several	6	Associates.
7	weeks after hiring plaintiff, he discussed with Kellogg	7	A. I don't recall. I don't recall. I don't
8	that plaintiff had been hired to work at Letke &	8	recall meeting -- I don't recall.
9	Associates in marketing; do you recall that?	9	Q. You don't recall one way or the other?
10	A. Best of my recollection, I don't recall having	10	A. Christopher Galloway?
11	a conversation with Mr. Letke.	11	Best of my recollection, I can't recall if I
12	Q. Did Maggie Britton ever discuss -- or did you	12	have met --
13	ever talk about Jerry Genova with Maggie Britton?	13	Q. Was the comptroller a salaried position?
14	A. The best of my recollection I don't ever	14	A. It was contractual.
15	recall having a conversation with Maggie about	15	Q. Contractual could be hourly and it could be
16	Mayor Genova.	16	salary, couldn't it?
17	Q. You don't recall one way or the other or you	17	A. It was contractual. He had a contract with
18	don't --	18	the City of Harvey.
19	A. No. I guess my point is Mayor Genova didn't	19	Q. And was he paid by salary or by the hour?
20	work for the City of Harvey.	20	A. By the -- the stipulation associated with his
21	Q. Right.	21	contract.
22	A. So the best of my recollection, I don't recall	22	Q. Okay. And what was that?
23	ever having a conversation with Maggie.	23	A. It was basically handling the financial
24	Q. Maggie didn't work for the City of Harvey, did	24	matters of the City of Harvey.
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1	she?	1	Q. Do you know if he was paid a salary or paid
2	A. Maggie was a contractual employee of the City	2	hourly?
3	of Harvey.	3	MR. SMITH: I'm going to object to the form of the
4	Q. Oh, she was.	4	question. If you -- if you understand the question.
5	A. That worked out of the City of Harvey's	5	I mean, are you suggesting that Mr. Letke had
6	office.	6	a W-2 from the City of Harvey, is that --
7	Q. Was Joe Letke an employee of the City of	7	MR. WALSH: No, I'm asking how he was paid, by
8	Harvey?	8	salary or by an hourly rate.
9	A. He could be considered a contractual employee	9	MR. SMITH: He said he was paid pursuant to
10	of the City of Harvey.	10	contract.
11	Q. As a department head, correct?	11	THE WITNESS: Right.
12	A. Well, again, it's consistent with the other	12	MR. WALSH: Exactly. So what was that? You tell
13	verbiages in the other document that you shared with me	13	me. If you understand that, you tell me, was it salary
14	earlier.	14	or hourly?
15	Q. He was the head of the finance department,	15	MR. SMITH: I'm not the witness.
16	correct?	16	MR. WALSH: Okay.
17	A. He handled all financial matters basically.	17	MR. SMITH: I'm trying to understand what the
18	Q. Is there such a thing as a finance department	18	question is.
19	at the City of Harvey?	19	MR. WALSH: I don't see how that's difficult.
20	A. There's the comptroller's office.	20	BY MR. WALSH:
21	Q. My question is is there a finance department	21	Q. Salary or hourly?
22	at the City of Harvey?	22	A. Well, contractual.
23	A. The finance for -- you know, a play of words,	23	Q. Contractual salary or contractual hourly?
24	finance, comptroller office, I -- I refer to it as a	24	A. Contractual.

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<p>1 Q. You don't know?</p> <p>2 A. Again, he was under a contract. He operated 3 off a contract so I can't speak to that actually in 4 exact numbers.</p> <p>5 MR. SMITH: Mr. Walsh, I don't mean to put a 6 question in your mouth, but was the contract based on an 7 annual salary or was the contract based on --</p> <p>8 MR. WALSH: I already asked that.</p> <p>9 THE WITNESS: He was contract.</p> <p>10 MR. SMITH: If you -- if you know.</p> <p>11 BY MR. WALSH:</p> <p>12 Q. There are police officers that are paid 13 hourly, correct?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And they are under a contract, correct?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. And then there are employees who are 18 under a contract and paid a salary, correct?</p> <p>19 A. Correct.</p> <p>20 Q. Okay. So the fact that someone is under 21 contract is not determinative of -- wait, let me 22 finish -- of whether someone is paid by salary or by the 23 hour.</p> <p>24 So putting aside for the moment that there's a</p>	<p>Page 82</p> <p>1 A. And he had to -- there was certain 2 stipulations in his contract that associated with the 3 financial matters of the City of Harvey.</p> <p>4 Q. Do you have a copy of his contract?</p> <p>5 A. Not in front of me.</p> <p>6 Q. At the city?</p> <p>7 A. I can -- I'm sure there has to be some form of 8 contract.</p> <p>9 Q. Okay. How -- did Maggie Britton -- do you 10 know if she was paid by salary or by hourly rate?</p> <p>11 A. Again, you're asking me a question relative to 12 Maggie Britton who worked for Mr. Letke.</p> <p>13 Q. Uh-huh.</p> <p>14 A. I don't know the interoperations of his 15 organization. I don't know how he paid Ms. Britton.</p> <p>16 Q. Earlier you said that Maggie Britton was an 17 employee of the City of Harvey.</p> <p>18 A. Contractual.</p> <p>19 Q. Employed at the City of Harvey, right?</p> <p>20 A. Well, let me --</p> <p>21 Q. So I'm asking you how --</p> <p>22 A. Just so we won't be confused, just so won't be 23 confused, Mr. Letke was awarded a contract, Mr. Letke 24 brought in individuals who worked for his office, but</p>
<p>1 contract, do you know whether Mr. Letke was paid by 2 salary or on hourly basis?</p> <p>3 A. Can I just --</p> <p>4 Q. Yeah.</p> <p>5 A. -- debate your point?</p> <p>6 MR. SMITH: You can't debate the point.</p> <p>7 I mean, I think the proper question is do you 8 know how Mr. Letke was paid?</p> <p>9 THE WITNESS: I want to respond to him, but I want 10 to --</p> <p>11 MR. WALSH: I think that's what I have been asking.</p> <p>12 THE WITNESS: Because the theory is --</p> <p>13 MR. WALSH: You can't --</p> <p>14 THE WITNESS: Oh, I'm sorry.</p> <p>15 BY MR. WALSH:</p> <p>16 Q. I just want to know, do you know if he was 17 paid by hourly or by salary?</p> <p>18 A. And I still say contractual.</p> <p>19 Q. So you don't know one way or the other?</p> <p>20 A. Contractual.</p> <p>21 Q. And like when you say contractual, what do you 22 mean?</p> <p>23 A. He had a contract with the City of Harvey.</p> <p>24 Q. Okay.</p>	<p>Page 83</p> <p>1 did work for the city.</p> <p>2 Q. Uh-huh.</p> <p>3 A. So Maggie Britton worked for Joseph Letke 4 technically, okay?</p> <p>5 Q. So she was paid by Letke or paid by Harvey or 6 by both?</p> <p>7 A. She was paid by Mr. Letke.</p> <p>8 Q. Okay. But not paid by Harvey?</p> <p>9 A. My understanding is she was paid by Mr. Letke.</p> <p>10 Q. And how many -- Strike that.</p> <p>11 Do you know if Mr. Letke would submit an 12 hourly invoice for employees that worked on Harvey 13 matters?</p> <p>14 A. Again, Mr. Letke had a contract that he was 15 paid based on the duties and responsibilities associated 16 with his contract.</p> <p>17 Q. So do you know whether he submitted an 18 invoice?</p> <p>19 A. Any -- anyone who does work for the City of 20 Harvey would have to submit some kind of, you know, form 21 of -- shall we say a receipt that let's the city know 22 that the work was being done.</p> <p>23 Q. And does the city have a form that went by a 24 particular name to do that?</p>

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<p>1 A. In terms of --</p> <p>2 Q. You know, other than calling it an invoice,</p> <p>3 did the City of Harvey have a particular name for such a</p> <p>4 form?</p> <p>5 A. I believe it was an invoice.</p> <p>6 Q. Okay. Did you ever see an invoice submitted</p> <p>7 by Joseph Letke?</p> <p>8 A. Again, the invoices would be submitted to the</p> <p>9 city council and the city council would vote on the</p> <p>10 invoices.</p> <p>11 Q. Did you ever see an invoice submitted by</p> <p>12 Joseph Letke?</p> <p>13 A. As I indicated, the processes --</p> <p>14 Q. Uh-huh.</p> <p>15 A. The City of Harvey has a finance committee</p> <p>16 that reviews the bills, the bills at that time, submit</p> <p>17 it to the city council or the city council votes on the</p> <p>18 bills.</p> <p>19 Q. That's -- thank you for the process, but I'm</p> <p>20 asking you, have you ever seen an invoice submitted by</p> <p>21 Letke & Associates?</p> <p>22 A. I can't recall if I ever --</p> <p>23 Q. You don't recall one way or the other?</p> <p>24 A. I can't recall.</p>	<p>Page 86</p> <p>1 Mr. Letke would submit an invoice, let me ask you this,</p> <p>2 when Mr. Letke submitted an invoice, did that invoice go</p> <p>3 straight to the council for approval or did someone else</p> <p>4 have authority to approve his invoices?</p> <p>5 A. Yeah, all invoices go through the city council</p> <p>6 for approval and they are voted on.</p> <p>7 Q. Okay. And are they voted on in the same</p> <p>8 format as they're submitted?</p> <p>9 A. I'm not -- I'm not sure what the question is</p> <p>10 you're asking me.</p> <p>11 I can only speak to the process in terms of</p> <p>12 what I know the process to be. I can't speculate. I</p> <p>13 can only tell you this is what the process is, the</p> <p>14 process, the bills are submitted, the aldermen --</p> <p>15 Q. Uh-huh.</p> <p>16 A. -- they peruse the bills and then they</p> <p>17 deliberate, legislate and vote on the bills.</p> <p>18 Q. Do you peruse the bills too?</p> <p>19 A. Generally I don't. Generally aldermen</p> <p>20 bills -- I really -- as I indicated earlier, my reliance</p> <p>21 on -- on those particular matters at the time was left</p> <p>22 to the automatic aldermen as well as Ms. Lewis.</p> <p>23 Q. So my question to you is do you ever peruse</p> <p>24 his bills?</p>
<p>1 Q. Okay. Do you know whether Mr. Genova worked</p> <p>2 on matters for the City of Harvey through Letke &</p> <p>3 Associates?</p> <p>4 A. Mr. Letke's interoperations relative to Letke</p> <p>5 & Associates -- I don't sit on the board of directors</p> <p>6 for Mr. Letke so I don't know who Mr. Letke hires.</p> <p>7 Q. So hiring, that might be one thing, but my</p> <p>8 question to you is do you know whether Mr. Genova worked</p> <p>9 on any Harvey matters while he was with Letke &</p> <p>10 Associates?</p> <p>11 A. Best of my recollection, Mr. Mayor Genova, you</p> <p>12 know, didn't work on any matters associated with City of</p> <p>13 Harvey, best of my recollection.</p> <p>14 MS. COURT REPORTER: Did you say didn't or did?</p> <p>15 THE WITNESS: No, he didn't.</p> <p>16 MS. COURT REPORTER: Okay. Just double-checking.</p> <p>17 THE WITNESS: Right. Just to the best of my</p> <p>18 recollection.</p> <p>19 BY MR. WALSH:</p> <p>20 Q. And what was the basis for that opinion?</p> <p>21 A. I've never seen Mr. -- I mean, Mayor Genova,</p> <p>22 you know, at the City of Harvey in the comptroller's</p> <p>23 office.</p> <p>24 Q. I believe you explained the process for when</p>	<p>Page 87</p> <p>1 A. Again, I don't -- no, your question was do I</p> <p>2 approve the bills.</p> <p>3 Q. Right.</p> <p>4 A. Right.</p> <p>5 And, again, as I indicated, my sister,</p> <p>6 Ms. Lewis --</p> <p>7 Q. Uh-huh.</p> <p>8 A. -- was in charge of the day-to-day operations.</p> <p>9 She worked very closely with the department heads and I,</p> <p>10 you know, periodically would -- would over -- you know,</p> <p>11 a ten, 11 year period I would, you know, look at a bill,</p> <p>12 but no bills in particular.</p> <p>13 Q. So is your sister at Harvey the most knowledge</p> <p>14 of Mr. Letke's invoices?</p> <p>15 A. I believe the aldermen as well as the ones who</p> <p>16 voted on the particular bills.</p> <p>17 Q. Okay. How about your sister?</p> <p>18 A. I believe -- she didn't vote on the bills.</p> <p>19 Q. Okay. But she was in charge of putting them</p> <p>20 together for the aldermen?</p> <p>21 A. No.</p> <p>22 Q. Who was in charge of doing that?</p> <p>23 A. The bills -- I believe the aldermen have to</p> <p>24 analyze, scrutinize the bills and then they submit the</p>

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	Page 90	Page 92
1	bills for passage.	
2	Q. Who submits the bills to the aldermen?	
3	A. I believe the -- if I'm not mistaken, it might	
4	be the comptroller's office submits the bills, all the	
5	bills.	
6	Q. Do you know whether the names of the employees	
7	of Letke & Associates that worked on Harvey matters	
8	would appear on the bills?	
9	A. I believe that Letke & Associates would appear	
10	on the bills, yes.	
11	Q. Could you repeat that? I'm sorry.	
12	A. I believe, if, in fact -- whatever name of the	
13	company would appear on the bills.	
14	Q. I'm asking you about the employees.	
15	A. The one --	
16	Q. Did the names of the employees at Letke &	
17	Associates that did work on Harvey accounts appear on	
18	the bills submitted to Harvey?	
19	A. No, it was my understanding that, you know, it	
20	would be Letke & Associates and -- such as that. I	
21	wouldn't think that each particular individual that	
22	worked for Mr. Letke and Harvey would be associated with	
23	the business.	
24	Q. Do you know whether their names appear on the	
	Page 91	Page 93
1	bills or are you guessing?	
2	A. No, I'm stating a fact, that Mr. Letke's bill	
3	would be submitted as Letke & Associates.	
4	Q. Uh-huh.	
5	A. And there wouldn't be a need for any	
6	individual itemized list associated with his company.	
7	It's Letke & Associates, not Letke and ten other people.	
8	Q. So the individual employee names did not	
9	appear on the bills that he submitted?	
10	A. My understanding is it was -- again, the best	
11	of my recollection is it was submitted as Letke &	
12	Associates.	
13	Q. And over the ten, 11 year period, I believe	
14	you said you may have looked at some bills, how many	
15	Letke & Associates bills did you look at?	
16	A. Again, as I indicated earlier, I don't	
17	specifically, you know, scrutinize or laser focus on one	
18	bill, I peruse the bills.	
19	Q. So do you have a recollection of how many	
20	Letke & Associate bills you've perused over the period	
21	that he was comptroller?	
22	A. As I indicated earlier, I don't -- I don't	
23	just specifically look at Mr. Letke's bills, I look at	
24	all bills.	

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1	written to you or that you are carbon copied on?	1	Mr. Letke, as well as a lot of the department heads, was
2	A. Yes.	2	quite limited. I can't recall ever actually, you know,
3	Q. Okay. Do you have a procedure where memos are	3	seeing him. I can't recall.
4	stamped received?	4	Q. Did you ever get to observe his work product?
5	A. No, generally what happens is that the various	5	A. I seen some of his documents.
6	memos from the various departments are put in large	6	Q. Did you observe enough of his work product to
7	envelopes and then, you know, come to the office, sit	7	be able to form an opinion of the job he did as
8	down and look at the various documentation.	8	comptroller?
9	Q. And is that something that Drenia Lewis does	9	MR. SMITH: I'm going object to the form of the
10	for you?	10	question based on the fact that the witness isn't
11	A. It could be Drenia Lewis, it could be one of	11	qualified to give an opinion as to the quality of the
12	the secretaries.	12	comptroller's work.
13	Q. And who are the secretaries?	13	If you -- if you're qualified to give an
14	A. Michelle Robinson (phonetic).	14	opinion as to the qualify -- the quality of Letke's
15	Q. Anyone else?	15	work, you can testify.
16	A. There's Michelle Robinson, yeah.	16	BY THE WITNESS:
17	Q. Is there another secretary?	17	A. Yeah, I don't have the expertise to actually
18	A. At City Hall, no, she was basically -- her and	18	grade his --
19	Ms. Lewis are kind of responsible for that.	19	MR. WALSH: I'm going to say those objections are
20	Q. Okay. Are you related to Michelle Robinson?	20	leading and I'm going to ask that you not do that any
21	A. No, sir.	21	longer, okay?
22	Q. Okay. Has Michelle Robinson ever done	22	Objections in Federal Court should just be to
23	political work for you?	23	form basically. These long speaking objections of if
24	A. I can't really say for sure.	24	you know, you can answer, if you understand the
Page 95		Page 97	
1	Q. Was she on the golf outing committee?	1	question, you can answer, that's all leading, okay?
2	A. I don't think so.	2	MR. SMITH: We can go off the record for a second.
3	Q. Do you know if she ever attended any political	3	MR. WALSH: No, we're staying on the record.
4	functions of yours?	4	MR. SMITH: Okay. We're on the record.
5	A. I can't recall ever seeing her.	5	MR. WALSH: Yeah.
6	Q. Do you recall seeing her at your campaign	6	MR. SMITH: You're asking a witness with a
7	office?	7	background in education whether he can evaluate the
8	A. I don't recall seeing her there. I can't	8	quality of a CPA's work, that's not a fair question.
9	recall.	9	MR. WALSH: Okay.
10	Q. Did you have an opportunity to observe	10	MR. SMITH: Okay.
11	Joe Letke performing the duties of comptroller?	11	BY MR. WALSH:
12	MR. SMITH: I'll object to the form of the	12	Q. Let me ask you this, who is in charge of --
13	question.	13	why isn't Mr. Letke working at Harvey anymore?
14	Observe?	14	MR. SMITH: I'm going to object to the question.
15	MR. WALSH: Uh-huh.	15	MR. WALSH: Why?
16	MR. SMITH: What do you mean observe?	16	MR. SMITH: Based on my prior objection because of
17	MR. WALSH: See.	17	the SCC litigation.
18	BY MR. WALSH:	18	MR. WALSH: It's not an objection, he can assert
19	Q. Did you see him perform the duties of	19	the Fifth Amendment if wants, but you can't object to a
20	comptroller?	20	relevant question.
21	A. In terms of sitting down and watching him	21	MR. SMITH: We are going to assert the Fifth
22	actually -- as I indicated earlier, due to the fact that	22	Amendment.
23	I was working at the school, my -- my observation was	23	MR. WALSH: Okay.
24	somewhat limited and my observation and interaction with	24	MR. SMITH: We are not going to discuss --

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1	MR. WALSH: Okay. Just -- just assert the Fifth	1 excuse me, appointed superintendent of District -- what
2	Amendment, don't object to the questions.	2 was the District?
3	MR. SMITH: Okay. We're going to assert the Fifth	3 A. 152.
4	Amendment and object to the question.	4 Q. Thank you.
5	MR. WALSH: Okay. So you didn't -- he's got to	5 152 in 2011, correct?
6	assert it, right, not you.	6 A. I believe it was 2010. I'm not sure of the
7	BY MR. WALSH:	7 exact date.
8	Q. So I'm going to ask you.	8 Q. Okay. And it was supposed to be a three year
9	Why doesn't Joseph Letke work at Harvey any	9 term?
10	longer?	10 A. It was a three year contract.
11	A. I'll assert the Fifth Amendment.	11 Q. A three year contract.
12	Q. Was Mr. Letke terminated from Harvey?	12 And did you leave before the expiration of the
13	A. I assert the Fifth Amendment.	13 contract?
14	Q. Did you make the decision to terminate	14 A. I retired.
15	Mr. Letke from Harvey?	15 Q. And who made the decision to appoint you
16	A. I assert the Fifth Amendment.	16 superintendent?
17	Q. Do you know whether Mr. Letke claims that he	17 A. There's an interview process.
18	resigned from Harvey?	18 Q. Okay.
19	A. I'll assert the Fifth Amendment.	19 A. Based on the qualifications and association
20	Q. Showing you what I will mark as Kellogg 7 --	20 and the interview, I was selected.
21	8, pardon me.	21 Q. How do you know what the basis was of you
22	(Kellogg Deposition Exhibit No. 8	
23	marked as requested.)	
24		22 being appointed?
		23 A. Qualifications.
		24 Q. Well, you didn't -- and I don't mean this
Page 99		Page 101
1	BY MR. WALSH:	1 facetiously, you didn't appoint yourself, correct,
2	Q. Do you recognize Exhibit 8?	2 someone else appointed you?
3	A. I assert the Fifth.	3 A. Absolutely.
4	Q. Do you know whether the contents of Exhibit 8	4 Q. So how do you know what --
5	are correct?	5 A. Yeah, the interview process.
6	A. I assert the Fifth.	6 Q. Okay. So there's an interview process.
7	Q. Have you seen Exhibit 8 before today?	7 And who interviewed you?
8	A. I assert the Fifth.	8 A. Board of Education, I believe, yeah.
9	Q. Generally speaking, who at Harvey has the	9 Q. Okay. The full board?
10	authority to terminate a comptroller?	10 A. I believe -- you know, generally, when there's
11	A. I assert the Fifth.	11 an interview process, there's -- you know, various
12	Q. Do you know of anyone -- Strike that.	12 staples of the community, Board of Education.
13	Do you know of any aldermen or supervisory	13 Q. And who were the members of the board at the
14	employee at the City of Harvey that has a CPA?	14 time you were appointed superintendent?
15	A. Any aldermen?	15 A. I believe it was -- I -- let me see.
16	Q. Uh-huh.	16 Ms. Rogers -- no, no, no, no. I don't believe
17	A. I don't -- the best of my recollection, I	17 she -- I can't really recall all the board members at
18	don't think any alderman has a CPA.	18 that time.
19	Q. Okay. So is there any alderman that would be	19 Q. Do you recall any?
20	qualified to give an opinion that Joseph Letke would be	20 A. Let me see.
21	terminated based on his work product?	21 Yeah, Ms. Kellogg Weaver was one.
22	A. I mean, that's -- I'm going to just take the	22 Q. That's your sister, correct?
23	Fifth on that.	23 A. Yes.
24	Q. I believe you testified you were voted -- or,	24 Q. Okay. Do you recall any others?

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1 A. I can't recall that.	1 A. Probably in communications, disseminating	
2 Q. And one of them was your cousin, wasn't it?	2 information.	
3 A. If that's what you say.	3 Q. Like fliers?	
4 Q. I'm asking you, was one of the board members	4 A. I would believe.	
5 your cousin?	5 Q. And how about Tyrone Rogers, has he done	
6 A. You just -- you just stated that that was my	6 political work for you?	
7 cousin.	7 A. I'm sure he has done some political work.	
8 Q. I'm asking you, was one of the board members	8 Q. Okay. What sort of political work has	
9 your cousin?	9 Tyrone Rogers done?	
10 A. What was her name?	10 A. Probably communicating with residents.	
11 Q. I'm asking you if one of the board members was	11 Q. Going door to door?	
12 your cousin.	12 A. I'm not sure if he went door to door, but just	
13 A. No, but you stated earlier that --	13 communicating with residents that he knows probably.	
14 Q. Right, and now I'm asking you.	14 Q. Do you know whether he's made any	
15 I'll withdraw the statement and now I'm asking	15 contributions to your campaigns?	
16 you a question. Was one of the board members your	16 A. I can't recall if he did.	
17 cousin?	17 Q. Did the superintendent position pay \$170,000?	
18 A. Yes.	18 A. I believe when I first -- my first year was	
19 Q. Okay. And who is that?	19 \$160,000, I think my -- my latter year could have been	
20 A. Linda Hawkins.	20 \$170. Slightly underpaid with other superintendents.	
21 Q. And was one of the board members	21 Q. Is that right?	
22 Tyrone Rogers?	22 A. Yes.	
23 A. I believe he was at the time.	23 Q. Other comparables make more?	
24 Q. And that is Janet Rogers' husband?	24 A. I believe so, yes.	
Page 103		Page 105
1 A. Yes.	1 THE WITNESS: Can I use the washroom?	
2 Q. And were there other Harvey employees on the	2 MR. SMITH: Yeah, you can.	
3 board that voted to appoint you superintendent?	3 BY THE WITNESS:	
4 A. I don't recall at the time what the vote was.	4 A. Yeah, if you -- you -- you look at Winnetka,	
5 Q. Has your sister, Joyce Kellogg Weaver, ever	5 Schaumburg --	
6 done political work for you?	6 Q. Did you say washroom?	
7 A. Yes.	7 A. Yeah, can I take a washroom break?	
8 Q. And what sort of political work has she done	8 Q. Oh, yeah. I thought you were still in the	
9 for you?	9 middle of the answer.	
10 A. Communicating with, you know, various	10 A. Oh, no, I'm sorry.	
11 residents, talking to residents.	11 MR. WALSH: Yeah, let's take a break.	
12 Q. And is that over the phone or in person?	12 (Discussion off the record.)	
13 A. I'm not sure. I can't recall her form of	13 BY MR. WALSH:	
14 method.	14 Q. Before the break I asked you some questions	
15 Q. But you've seen her at the campaign office?	15 about Tyrone Rogers, he was the president of the school	
16 A. Yes.	16 board for a period, correct?	
17 Q. Has she made a political contribution to your	17 A. Yes.	
18 campaign?	18 Q. And did Tyrone Rogers have any jobs at the	
19 A. I'm not sure.	19 City of Harvey that you're aware of?	
20 Q. How about Linda Hawkins, has she done	20 A. Yes.	
21 political work for you?	21 Q. What jobs did he have?	
22 A. Yes. In the past, yes.	22 A. He was -- he worked with Metra parking lot	
23 Q. And in what way has she done political work	23 and -- yeah, Metra parking lot.	
24 for you?	24 Q. And what did he do at the Metra parking lot?	

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1	A. He looked over the entire city lot as well as	1	Q. Did anyone say anything to that effect to you?
2	Metra lines in terms of, you know, ensuring that patrons	2	A. Again, I can't recall if anyone specifically
3	would come in and he would collect the -- the fees from	3	was saying that he was stealing money.
4	the individual patrons who utilized the lot.	4	Q. Okay. If you knew that Tyrone Rogers was
5	Q. And who gave him that position?	5	stealing money from the Metra lot, is that something
6	A. You talking about -- I don't recall how --	6	that you would report to law enforcement?
7	Q. You talking 2001, correct?	7	A. If anyone does anything that's illegal, I
8	A. You talking -- I think he was hired in	8	would terminate and report to authorities.
9	2003 and I believe he had -- when he first started, he	9	Q. Okay. Let's take a look at Exhibit 8, if you
10	started in as an assistant and then he kind of -- was	10	wouldn't mind.
11	kind of -- I don't recall exactly.	11	Paragraph 7 on Page 2.
12	Q. Did you appoint him to that position?	12	A. Okay.
13	A. Well, again, I know initially he -- that	13	Q. And the preface to this is that this decision
14	wasn't the initial job he had in 2003, so...	14	is based upon reflection of the following and No. 7
15	Q. Once he became the head of overseeing the city	15	says, Internal control, on several occasions we
16	Metra lot, was that a job that you placed him in?	16	identified an issue with deposits for Metra and commuter
17	A. I believe so, yes.	17	parking lots, the administration refuses to reprimand
18	Q. Okay. And did Tyrone have some qualifications	18	individuals who are responsible for those deposits.
19	that suited him for that position?	19	Do you know if that refers to Tyrone Rogers?
20	A. Yeah, he was a great people person and he had	20	A. Again, I can't recall the specifics say who --
21	great skills in terms of working with the general	21	you know, in terms of this particular No. 7 you're
22	public.	22	speaking to, but, again, as I indicated, anyone who --
23	Q. Okay. At some point did you learn that	23	that I suspect or if it was brought to me, you know, in
24	Tyrone Rogers was taking money from the Metra lot?	24	a formal charge, that certainly there will be
Page 107		Page 109	
1	MR. SMITH: I'll object to the form of the	1	consequences.
2	question.	2	Q. Have you been interviewed by any law
3	THE WITNESS: Taking money --	3	enforcement agency about Tyrone Rogers stealing money
4	MR. WALSH: Keeping money --	4	from the Metra lots?
5	MR. SMITH: Stealing --	5	A. No, sir.
6	BY MR. WALSH:	6	Q. Do you know whether Tyrone Rogers has been
7	Q. Stealing money from the Metra lot.	7	interviewed by any law enforcement agency about stealing
8	A. When you say stealing from the Metra lot --	8	money from the Metra lots?
9	Q. Uh-huh.	9	A. Not to my knowledge.
10	A. -- I would have to say that I -- I can't	10	Q. He hasn't told you that?
11	recall if -- if anyone ever, you know, indicated that he	11	A. Not to my knowledge.
12	was stealing money.	12	Q. Do you know whether a Harvey police officer
13	Q. You don't recall one way or the other?	13	eventually had to accompany Mr. Rogers when he picked up
14	A. I can't recall if they said he was actually	14	the money from the Metra lots?
15	stealing money, but I know they put a new policy in	15	A. As I indicated earlier, there was some new
16	place regarding the handling of money, but I can't	16	policies put in place by the chief of police regarding
17	recall.	17	not only Metra, but as well as the police department
18	Q. And who put the new policy in place about	18	when they're handling money.
19	handling the money?	19	Q. And how did you learn this new policy?
20	A. I believe it was the chief of police.	20	A. I believe Chief Eaves.
21	Q. Did anyone suggest to you that Tyrone Rogers	21	Q. He told you?
22	was taking money from the Metra lot -- stealing money?	22	A. Yes.
23	A. I can't recall anyone specifically saying that	23	Q. Okay. Was that a face-to-face meeting or over
24	he was stealing money.	24	the phone?

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1 A. I believe it was a face-to-face meeting.	1 the Metra lot?	Page 112
2 Q. Okay. And what did he say to you and what did	2 A. I believe with the accompaniment of the -- of	
3 you say to him?	3 an officer as well as any individual who handles money	
4 A. I can't recall the context of the meeting.	4 in the City of Harvey.	
5 Q. Did he tell you why he was creating a new	5 Q. And Tyrone Rogers' wife I believe we already	
6 policy for the Metra lot?	6 established is Janet Rogers?	
7 A. I can't recall the context of the meeting.	7 A. Yes.	
8 Q. Do you know if a police officer began to	8 Q. And she was on the school board in 2004; is	
9 escort Mr. Rogers?	9 that correct?	
10 A. Pardon me?	10 A. I'm not sure of the dates.	
11 Q. Do you know whether a police officer began to	11 Q. And I believe -- well, which -- did she do	
12 escort Mr. Rogers to pick up the Metra receipts?	12 political work for you?	
13 A. I know that there's a police officer escorting	13 A. Yes.	
14 Mr. Rogers and also any -- any time that they handle	14 Q. Okay. And do you know whether she contributed	
15 money, there is a police officer escorting, you know,	15 to your campaigns?	
16 the moneybag and wherever there's money.	16 A. I'm not sure.	
17 Q. Do you know which officer escorted Mr. Rogers?	17 Q. And do you know whether she was convicted of	
18 A. It's -- it's -- I'm not sure because I think	18 two felonies at some point?	
19 every day is a different officer I believe. I'm not --	19 A. Yes.	
20 I'm not sure exactly because sometimes I believe it	20 Q. Yes, she was?	
21 was -- I forgot his name -- Wright, I believe.	21 A. Yeah, but she has been pardoned, I believe.	
22 Q. The officer?	22 Q. Okay. And before she was -- Strike that.	
23 A. I believe his name was Wright.	23 When she was convicted, she stepped down as	
24 Q. Okay. Do you know whether the Metra receipts	24 president of the school board, correct?	
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1 have ever been audited?	1 A. Yes.	
2 A. I'm not sure.	2 Q. And did her husband replace her as president	
3 Q. Did you ever go to the Metra lot and count the	3 of the school board?	
4 cars?	4 A. Well, the school board is basically voted upon	
5 A. No, not me.	5 by the members of the board so he became the president,	
6 Q. Do you know of anyone who did?	6 I don't know if that would be considered replacing her.	
7 A. Possibly Ms. Lewis and Chief Eaves.	7 Q. And I believe you said she was pardoned,	
8 Q. Drenia or Betty Lewis?	8 correct?	
9 A. Drenia.	9 A. I believe so.	
10 Q. And do you know why they went to count the	10 Q. By Governor Quinn?	
11 cars?	11 A. I believe so.	
12 A. I'm not specifically sure why.	12 Q. Okay. And did you write a letter of support	
13 Q. Do you know when they went to count the cars?	13 for her?	
14 A. No, I can't recall the exact date.	14 A. Yes, I did.	
15 Q. Do you know what year?	15 Q. And now she's back on the school board?	
16 A. I can't recall the exact year.	16 A. Yes, she is.	
17 Q. Do you know if it was in 2013?	17 Q. Did you play any part in her getting back on	
18 A. I'm not sure.	18 the school board other than writing her letter of	
19 Q. How did you learn that Ms. Lewis and	19 pardon -- or seeking a pardon?	
20 Chief Eaves went to count cars at the Metra lot?	20 A. I might have, you know, disseminated some	
21 A. I believe one of them told me.	21 information pertaining to her reelection maybe.	
22 Q. Did they tell you why they were doing that?	22 Q. And what do you mean by that, by disseminating	
23 A. I can't recall the extent of the conversation.	23 some information?	
24 Q. Does Tyrone Rogers still collect money from	24 A. Well, if someone asked me what -- what kind of	

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<p>1 person was she, you know, I can speak on the fact that I 2 recall when she was -- her son was playing football for 3 the Harvey coach and when he played for Thornton, I 4 always saw her as a very consciousness mom, I saw her as 5 an educator out in Bloomington Township and from what I 6 knew of her in terms of, you know, love and affection 7 that she showed the children of the community, but more 8 importantly, showed her own children and as an educator, 9 I would just speak on that behalf.</p> <p>10 Q. And you didn't have a problem with her being 11 on the school board with a felony?</p> <p>12 A. Well, that really wasn't my -- my -- my 13 decision, my call. I couldn't make, you know --</p> <p>14 Q. Well, when you spoke on her behalf, you knew 15 she had a felony, right?</p> <p>16 A. No, in terms of when I spoke regarding 17 Ms. Thomas, I generally spoke over the course of the 18 years.</p> <p>19 Q. When you say Ms. Thomas, that's Janet Rogers' 20 maiden name, correct?</p> <p>21 A. It was Janet Thomas at the time, yes.</p> <p>22 Q. Okay. Did you ever speak on her behalf -- or 23 I think you said disseminated information in order to 24 get her back on the school board, right?</p>	<p>1 Q. They can still become productive members of 2 society?</p> <p>3 A. I think -- I believe so. 4 I mean, in every -- you know, I believe 5 everyone needs a second opportunity.</p> <p>6 Q. Right.</p> <p>7 The felony that she was convicted of related 8 to schools, didn't it?</p> <p>9 A. It was something involving her son, I'm not -- 10 I'm not --</p> <p>11 Q. Understanding her income in order to get a 12 student loan for her son?</p> <p>13 A. I don't understand -- I -- I wasn't -- I don't 14 really understand the total, you know, operations of 15 that.</p> <p>16 Q. Did you ever know what she was convicted of?</p> <p>17 A. It was something related to her son and I 18 believe a school loan or something like that.</p> <p>19 Q. Did you ever look to find out what she was 20 convicted of in more detail before you disseminated 21 information on her behalf?</p> <p>22 A. Well, I can only go by what she told me and I 23 can only go by what -- experiences that I had with her 24 and things that I saw her operating in the community.</p>
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<p>1 A. Disseminate information to individuals who 2 would ask me relative to Ms. Thomas and I would give 3 them my interpretation of what I thought and what I felt 4 in regards to Ms. Thomas.</p> <p>5 Q. And did you feel that despite her felony 6 conviction she would still be a productive member of the 7 school board?</p> <p>8 A. Well, I think due to the fact -- the nature of 9 what she was being charged with -- I thought it involved 10 something with her son, but I can only speak on -- on 11 the fact of what I seen her in the community, how she 12 worked with the kids and her compassion and commitment 13 to children, so I spoke on that.</p> <p>14 Q. So do you, as you sit here today, think that 15 she's a good choice to be on the school board even 16 though she has two felony convictions?</p> <p>17 A. She don't have two felony convictions.</p> <p>18 Q. She was pardoned.</p> <p>19 Do you think -- even though she was in the 20 past convicted of two felonies, do you think that she's 21 a good choice to be on the school board?</p> <p>22 A. Well, I mean, I think -- I -- I don't 23 discriminate against individuals who have felonies. I 24 mean, they --</p>	<p>1 I mean, she -- she always seemed to be a very, 2 you know, high quality person when I saw her and so I 3 just -- was based on that.</p> <p>4 Q. Did you say you retired from being 5 superintendent?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And how long before the -- or before 8 your contract was to expire did you retire?</p> <p>9 A. I think I -- I don't know the exact date, but 10 it was some months -- you know, my contract was up 11 June 30th, I believe, and so I retired June 30th.</p> <p>12 Q. Okay. And did you receive a payout from the 13 school board when you retired?</p> <p>14 A. Yes, I did.</p> <p>15 Q. Okay. And how much?</p> <p>16 A. I think it was about \$240,000.</p> <p>17 Q. Okay. And do you know why you received that 18 payout?</p> <p>19 A. Because at the time, you know, it was based 20 on -- if, in fact -- it was an early buyout associated 21 with my contract and at the time I was considering 22 extending my contract.</p> <p>23 Q. Uh-huh.</p> <p>24 A. And so there is -- you know, the board and I</p>

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1 mutually greed to the buyout.	1 A. Again, it was negotiated.	
2 Q. Now, you retired on the day that your contract	2 Q. Right.	
3 expired, correct?	3 When you were negotiating, did you ask for a	
4 A. Actually, the negotiations associated with the	4 pension payment?	
5 buyout and the -- my -- my resignation was done	5 A. I can't recall if I did or didn't.	
6 sometime, I believe, in January and February.	6 Q. Did you have a lawyer?	
7 Q. Is that the time at which they decided to give	7 A. I believe I did, yeah.	
8 you the payout?	8 Q. Who was it?	
9 A. It was mutually agreed to -- you know,	9 A. In terms of --	
10 stipulation associated with that particular buyout.	10 Q. Negotiating the --	
11 Q. Okay. Understood.	11 A. No, no, no, at -- at -- during the -- no, I	
12 What I'm asking you though is that the time	12 was -- I don't recall. As a matter of fact, I don't	
13 frame, it was decided in January or February?	13 believe I had an attorney in attendance with me that	
14 A. I believe it was -- I don't know the exact	14 night.	
15 date when we entered into the negotiations, but, again,	15 Q. Okay. Who in the City of Harvey is in charge	
16 it was mutually negotiated by both parties.	16 of overseeing city spending?	
17 Q. And did your sister vote in favor of that?	17 A. Well, that's pretty broad.	
18 A. I don't know the -- or even recall who all	18 Q. All right. Yeah, let me -- let me try to	
19 voted, but, again, it was mutually voted upon by -- by	19 narrow it down.	
20 the board and it was agreed by both parties.	20 Is there a limit under which department heads	
21 Q. Do you know if anyone on the board abstained	21 can spend money without seeking board approval?	
22 from that vote?	22 A. I believe -- I believe there's a limit.	
23 A. I'm not sure.	23 Q. Do you know what the number is?	
24 Q. And do you know anyone that voted in favor of	24 A. I don't -- I don't recall the number right	
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1 it?	1 offhand.	
2 A. Again, I'm not sure.	2 Q. And then is there a separate procedure if a	
3 Q. Okay. And then did the school board make an	3 department head wants to spend money over that limit?	
4 additional payment on your behalf to a State pension?	4 A. Well, generally -- my understanding is that	
5 A. Again, it was a negotiated package that was	5 when a department head has a request for expenditures,	
6 negotiated and both parties felt comfortable with the	6 that they were to submit those particular requests to	
7 negotiated package.	7 Ms. Lewis and Mr. Letke.	
8 Q. Did they make a lump-sum payment of over	8 Q. Does your son work for Harvey?	
9 \$100,000 to pension on your behalf at that time?	9 A. When you say work for --	
10 A. It was a negotiated settlement. It was a	10 Q. Uh-huh.	
11 settlement agreement.	11 A. My son -- he did some work for the City of	
12 Q. Do you know the amount?	12 Harvey, he doesn't work for the city.	
13 A. Again, it was a negotiated settlement	13 Q. Okay. And what sort of work did he do for the	
14 agreement which both parties agreed.	14 City of Harvey?	
15 Q. Do you know whether that settlement agreement	15 A. He did some social media.	
16 included a pension payment?	16 Q. And do you know what sort of social media he	
17 A. It was, again --	17 did?	
18 Q. I understand it was a negotiated settlement,	18 A. I believe it was Facebook and things of that	
19 but I'm asking you, did the settlement agreement include	19 nature.	
20 a pension payment?	20 Q. And does your son live in Harvey?	
21 A. I don't have the documents in front of me and,	21 A. No, he doesn't.	
22 again, this is -- I can't recall the exact stipulations	22 Q. And do you know how your son -- or strike	
23 associated with that.	23 that.	
24 Q. Did you ask for a pension payment?	24 Did he have a contract with the City of	